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**MOTION TO DISMISS FOR INSUFFICIENCY OF SERVICE OF PROCESS AND
LACK OF PERSONAL JURISDICTION**

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

INTERNATIONAL GOLDEN FOODS, INC.)
and SOCIETE IBRAHIM de COMMERCE)
S.A.R.L.,)

Plaintiffs,)

vs.)

TRANSGLORY TUNISIA S.A.R.L.,)
(Specially Appearing))

Defendant,)

FILED

JAN 11 2011

Jan 11, 2011

MICHAEL W. DOBBS

CLERK, U.S. DISTRICT COURT

Case No. 09 CV 3875

Hon. Judge James B. Zagel

TRANSGLORY TUNIS S.A.R.L.'s MOTION TO DISMISS

Transglory Tunisia S.A.R.L., making a special appearance before this Court, moves this Court for an Order dismissing this action from improper service under U.S. Fed. R. Civ. P. 2(b)(4), and for lack of personal jurisdiction under U.S. Fed. R. Civ. P. 12(b)(2). As detailed in Defendant's Memorandum of Law, Plaintiff improperly served Defendant. Moreover, this Court lacks jurisdiction over the Defendant because the Defendant does not have contact with this district, or with the State of Illinois, and because the parties have expressly entered into a contract designating the United States District Court for the Southern District of New York as the forum where all disputes arising from the contract contained within the bill of lading will be adjudicated.

In further support, Defendant has filed a Memorandum of Law.

WHEREFORE, Defendant Transglory Tunisia S.A.R.L. respectfully requests that this Court enter an order dismissing this action against the Defendant, or granting any other further relief this Court deems just and proper.

Dated 01.07.2011

Respectfully Submitted,



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